

Exhibit K

From: [Rueckheim, Mike](#)
To: [Bobby Delafield](#)
Cc: [Timothy Grochocinski](#); [Ed Nelson](#); [Rylie Parkins](#); [Vidal, Kathi](#); [Dale, Ahtoosa](#); [Arbaugh, Natalie](#); [Winston-Micron-Unification](#); [Jon Rastegar](#); [Tong, Peter](#); [Melsheimer, Tom](#)
Subject: RE: Unification Techs. v. Micron, WDTX-6-20-cv-0500
Date: Friday, July 16, 2021 10:55:48 AM
Attachments: [image002.jpg](#)
[image003.png](#)
[07.09.2021 UTL Letter to Micron re 3rd Party Code.pdf](#)

Counsel, we are in receipt of your July 9, 2021 letter (attached) requesting Micron to produce third party source code that is not in Micron's possession, custody or control. We are confused by your statement that "[b]ased on the agreements between Micron and the Controller Suppliers, Micron has the right to inspect such source code." UTL has not cited to any language in a Micron agreement that would support your request. Also, the case opinions you cite are inapposite. *See Polaris PowerLED Technologies LLC v. Vizio, Inc.* (ordering production of documents when a redacted agreement was found to give the defendant the "legal right to obtain documents upon demand"); *LSI Corp. v. Visio, Inc.*, Case No. A-12-CV-191 LY, 2012 WL 1883998, *4 (W.D. Tex. May 22, 2012) (requested materials from "a related corporate entity"). UTL is apparently aware of the fact that the requested materials are not in Micron's possession, custody or control as shown by the fact that UTL is pursuing third party discovery through subpoena practice. We request that UTL produce all communications and responses to those subpoenas.

-Mike

Michael R. Rueckheim

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From: Bobby Delafield <bobby@nbafirm.com>
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Cc: Timothy Grochocinski <tim@nbafirm.com>; Ed Nelson <ed@nbafirm.com>; Rylie Parkins <rylie@nbafirm.com>; Vidal, Kathi <KVidal@winston.com>; Dale, Ahtoosa <ADale@winston.com>; Arbaugh, Natalie <NArbaugh@winston.com>; Winston-Micron-Unification <Winston-Micron-Unification@winston.com>; Jon Rastegar <Jon@nbafirm.com>; Tong, Peter <PTong@winston.com>; Melsheimer, Tom <TMelsheimer@winston.com>
Subject: RE: Unification Techs. v. Micron, WDTX-6-20-cv-0500

Counsel,

Please see the attached correspondence.

Regards,
Bobby

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